

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Janet Molesky, individually and on  
behalf of all others similarly  
situated,

Plaintiff,

v.

Capital Management Services, LP,

Defendant.

Docket 3:15-cv-02051-EMK

(JUDGE EDWIN M. KOSIK)

Complaint – Class Action

FILED ELECTRONICALLY

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**Plaintiff's Motion to Amend Complaint**

1. Plaintiff seeks leave of court to amend her complaint under Fed.R.Civ.P. 15(a)(2).
2. The amended complaint would add a second named Plaintiff.
3. Defendant has not responded to a request for concurrence.
4. The proposed amended complaint is attached as Exhibit 1.
5. Attached as Exhibit 2 is the redline highlighting the amendments, as required by LR 15.1(b).

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff leave to file the amended complaint.

Respectfully Submitted,

s/ Carlo Sabatini

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Attorney for Plaintiff and the Class

### **Certificate regarding Concurrence and Service**

Concurrence was requested on December 15, 2015. Defendant has not responded to the request.

Defendant is being served through the CM/ECF system.

s/ Carlo Sabatini  
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Carlo Sabatini